

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JAMES CELESTE, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

INTRUSION, INC., JACK B. BLOUNT,
MICHAEL L. PAXTON, B. FRANKLIN
BYRD, T. JOE HEAD, GARY DAVIS, and
JAMES GERO,

Defendants.

GEORGE NEELY and JOAN NEELY,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

INTRUSION, INC., JACK B. BLOUNT,
MICHAEL L. PAXTON, B. FRANKLIN
BYRD, T. JOE HEAD, GARY DAVIS, and
JAMES GERO,

Defendants.

§ CIVIL ACTION NO. 4:21-cv-00307-SDJ

§ **[LEAD CASE]**

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§ CLASS ACTION

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§ CIVIL ACTION NO. 4:21-cv-00374-SDJ

§ **[CONSOLIDATED]**

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§ CLASS ACTION

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**JOINT MOTION FOR STAY OF PROCEEDINGS PENDING THE FILING OF A
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

COME NOW Lead Plaintiff Andrew Bronstein (“Lead Plaintiff”) and Defendants
Intrusion, Inc., Jack B. Blount, Michael L. Paxton, B. Franklin Byrd, T. Joe Head, Gary Davis,
and James Gero (the “Defendants”, and together with Lead Plaintiff, the “Parties”) and file this

Joint Motion for Stay of Proceedings Pending the Filing of a Motion for Preliminary Approval of Class Action Settlement, and in support thereof, respectfully offer and state as follows:

The Parties engaged in a mediation on April 5, 2022, at the conclusion of which the Parties executed a settlement term sheet setting forth the material terms associated with the resolution of this action (the “Settlement Term Sheet”).

In accordance with the Settlement Term Sheet, the Parties have agreed to cease all litigation activities in this action, except those related to the negotiation of the final stipulation and agreement of settlement and related agreements and preparation for seeking preliminary approval of the settlement from the Court.

The Parties further agree that a stay of proceedings while the Parties negotiate the final stipulation and agreement of settlement and prepare for seeking preliminary approval of the settlement would promote judicial economy, and it would be in the interest of the Parties and the interest of justice to minimize the expenditure of judicial time and resources by resolving administrative issues by mutual agreement where possible.

WHEREFORE, the Parties hereby agree and jointly move the Court to enter an Agreed Order staying proceedings in this matter pending the anticipated filing of a Motion for Preliminary Approval of Class Action Settlement, in the form and for the reasons stated in the attached [Proposed] Agreed Order.

Dated: April 12, 2022

Respectfully submitted,

/s/ Stuart L. Cochran

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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Brent J. LaPointe